

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

**Case No. 3:23-CV-04597-EMC**

**[PROPOSED] ORDER**

**ASHLEY GJOVIK**, *an individual*,

Plaintiff,

v.

**APPLE INC**, *a corporation*,

Defendant.

**DISCOVERY DISPUTE:  
PRODUCTION**

**[PROPOSED] ORDER COMPELLING PRODUCTION OF ALL RELEVANT, NON-  
PRIVILEGED DOCUMENTS**

Pending before the Court is Plaintiff's request for judicial intervention in a discovery dispute with the Defendant.

[enter decision here]

IT IS HEREBY ORDERED that Defendant is compelled to produce relevant, non-privileged documents, and confidentiality disputes can be handled issue by issue, or with a joint-agreed, targeted protective order.

Dated: \_\_\_\_\_

\_\_\_\_\_  
JUDGE KANDIS A. WESTMORE

U.S. DISTRICT COURT JUDGE